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June 10, 2022

**By ECF**

Hon. Cheryl L. Pollak  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, N.Y. 11201

Re: *Islam v. Hochul*, E.D.N.Y. No. 20 Civ. 2328 (LDH) (CLP)

Dear Judge Pollak:

This Office represents the defendants, including the New York State Department of Labor ("DOL"), in the above-referenced action. We write pursuant to Your Honor's Individual Practices to respectfully request, on behalf of all parties, that the Court grant a two-week adjournment of the settlement conference scheduled on June 14, 2022.

At the April 14, 2022, conference, the Court and the parties identified four issues for further discussion. On May 10, 2022, Plaintiffs' counsel provided a written position statement regarding those issues, including the text of certain proposed disclosures. All counsel participated in a video conference on June 2, 2022, at which we summarized DOL's responses to Plaintiffs' proposals and agreed to provide further responses in writing. DOL has drafted its responses, including alternative disclosures, and it is currently being finalized.

We plan to provide DOL's written response to Plaintiffs' counsel early next week. The parties request a brief adjournment of the conference to afford Plaintiffs an opportunity to review DOL's response, and for all counsel to confer. Accordingly, we respectfully request that the conference be adjourned to June 28, 2022, or a date thereafter that is convenient for the Court.

Should the Court prefer to proceed with the conference as scheduled, the parties, of course, remain available to discuss the progress of their discussions to date.

We appreciate Your Honor's continued attention to this matter.

Respectfully,

*Michael A. Berg*

Michael A. Berg  
Assistant Attorney General

cc: All Counsel of Record